

1 **ERIC S. SMITH, Esq.**  
2 **SMITH & WILLIAMS**  
3 **P.O. Box 5133 CHRB**  
4 **Saipan, MP 96950**  
5 **Telephone No. (670) 233-3334/5**  
6 **Facsimile No. (670) 233-3336**

7 **Attorneys for Plaintiff**  
8 **Modesta Manglona Nadar**

9 **IN THE UNITED STATES DISTRICT COURT**  
10 **FOR THE NORTHERN MARIANA ISLANDS**

11 **MODESTA MANGLONA NADAR,** ) **CIVIL CASE NO. 07-0024**  
12 )  
13 )  
14 **Plaintiff,** )  
15 )  
16 **vs.** ) **PLAINTIFF'S PRE-DISCOVERY**  
17 ) **DISCLOSURE STATEMENT**  
18 **NAINA ENTERPRISES (CNMI) INC. dba )**  
19 **ALSON'S STORE,** )  
20 )  
21 **Defendant.** )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

COMES NOW, Plaintiff, by and through counsel, and hereby submits the following  
prediscovery disclosures pursuant to Federal Rule of Civil Procedure 26(A)(1) and Local Rule  
16.2 CJ (d).

A. Persons With Potentially Discoverable Information

Modesta Manglona Nadar: Plaintiff. She has information as to the facts as alleged in  
the Complaint. She can be contacted via the offices of Plaintiff's counsel.

Ponnu Nadar: Plaintiff's Husband. He has information as to the facts as alleged in the  
Complaint. He can be contacted via the offices of Plaintiff's counsel.

1 Alson's store attendant: May have information as to the July 7, 2005 incident.

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3 B. Description of Relevant Document

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5 --photographs of Alson's store

6 --medical records of Plaintiff

7 --any documents identified by Defendant in response to discovery requests

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9 C. Damages Claimed By Plaintiff

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11 Plaintiff claims damages for personal injury to include past and future medical expenses,  
12 past and future impairment of the ability to enjoy life, mental anguish, physical suffering,  
13 statutory damages and, where appropriate, pre-judgment interest. In addition, Plaintiff prays for  
14 an injunction enjoining Defendant from its acts of discrimination under Title 3 of the ADA, and  
15 compliance with the ADA. Plaintiff claims attorney fees and costs in this litigation.

16  
17 Dated: November 14, 2007.

18 SMITH & WILLIAMS  
19 Attorneys for Plaintiff Modesta M. Nadar

20  
21 By: /s/  
22 Eric S. Smith